

GUIDELINES ON TRANSPARENCY REGARDING GRANTEES WORKING IN HIGH RISK ENVIRONMENTS

As a matter of policy, and consistent with the interests of our grantees, transparency is deeply embedded in our grant making culture. Since the first year of operation, we have produced public information that is provided in an annual report and on the website detailing to whom, in what amounts, and the purposes for which grants were awarded during the fiscal year. At the same time, in certain high risk environments in which governments deal harshly with democracy and human rights activists, or where there is a high level of political violence, we have chosen to publish (in printed matter and online) slightly more generalized versions of grant support to groups working inside such countries. The decision to do so is neither taken lightly nor in haste and is limited to those instances which are the most sensitive. Nonetheless, we always maintain a high standard of transparency, while taking into account the concerns and needs of those grantees that are operating in the most difficult environments. On occasion, different grantees based in the same country may face varying degrees of risk, and each grant is considered on a case-by-case basis.

GUIDANCE

It is normal practice to list the following grantee information in a print version of the annual report:

- Summary highlights of regional developments and grantee efforts
- Grantee organization name
- Grant amount
- Project title

On the website, we typically delineate by country for each grant made:

- Grantee organization name
- Grant amount
- Short Summary of the supported activities

ALTERNATIVES FOR HIGH RISK ENVIRONMENTS

In exceptional circumstances, it also has been our practice to omit the name of individual grantee organizations while providing a project title or brief description of activities under a program focus category, including the funding amounts as well. The exceptional circumstances are those in which the right to seek, receive, and utilize foreign funding is not respected. Such circumstances include those in which the receipt of foreign resources is criminalized or administratively penalized, or in which the receipt of foreign funding may be used as a pretext by state or non-state actors to inflict harm against those practicing their right to freedom of association. When a Program Officer believes it may be justified to consider a variance from our standard approach to reporting on grants, staff should follow the accompanying procedures document to ensure that all appropriate factors are considered.